

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

WILLIAM LOCKWOOD

\*

Plaintiff

\*

v.

\*

Civil Action No. WMN-02-CV-2068

PACIFIC USA, LTD., et al.

\*

Defendants

\*

\* \* \* \* \*

**PLAINTIFF'S MOTION TO REOPEN ACTION**

William Lockwood, by his attorneys, Paul D. Bekman, Michael P. Smith, and Salsbury Clements Bekman Marder & Adkins, L.L.C., hereby moves to reopen this action, and for good cause states as follows:

1. This product liability action settled on or about December 8, 2003. Under the settlement order entered, the action was dismissed without prejudice to either party's right to move to reopen within 30 days if settlement was not yet consummated.
2. Plaintiff has been advised by the Defendants' counsel that through no fault of the parties or their counsel, the settlement cannot be consummated until approximately January 11, 2004.
3. Plaintiff respectfully requests that the Court reopen the action, delay the entry of a dismissal with prejudice for another two weeks, and provide the parties until January 20, 2004, to consummate the settlement.
4. Counsel for the Defendant has been advised of the filing of this motion and has no objection to the relief requested.

WHEREFORE, the Plaintiff, William Lockwood, respectfully requests that this Honorable Court reopen the action, delay the entry of a dismissal with prejudice for another two weeks, and provide the parties until January 20, 2004, to consummate the settlement.

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MARDER & ADKINS, L.L.C.  
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(410) 539-6633

Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6th day of January, 2004, a copy of the foregoing Plaintiff's Motion to Reopen was forwarded electronically to the following:

Edward J. Lopata, Esquire  
Scott Thomas, Esquire  
Tydings & Rosenberg LLP  
100 E. Pratt Street, 26<sup>th</sup> Floor  
Baltimore, Maryland 21202  
Attorneys for Third-Party Defendant  
SR Suntour, Inc. and SR Suntour, USA

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MICHAEL P. SMITH